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8 UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

9 In re:

10 NORTHWEST TERRITORIAL MINT, LLC,  
11  
12 Debtor.

Case No. 16-11767-CMA

DECLARATION OF PAUL WAGNER  
IN SUPPORT OF IN SUPPORT OF  
MOTION FOR ORDER APPROVING  
THE SALE OF CERTAIN OF THE  
DEBTOR'S ASSETS TO  
MEDALCRAFT MINT, INC.

13  
14  
15 I, Paul Wagner, hereby declare:

16 1. I am the Chief Information Officer of Northwest Territorial Mint, LLC ("NWTM" or  
17 "Debtor"). Unless otherwise stated, I make the following statements based on my personal  
18 knowledge. I submit this Declaration in support of the Motion for Order Approving the Sale of  
19 Certain of the Debtor's Assets to Medalcraft Mint, Inc. (the "Motion"). I have been employed by the  
20 Debtor for approximately five years. I am over the age of eighteen and I am competent in all ways to  
21 testify.  
22

23 2. Medallic Art Company, LTD ("Medallic LTD") is the predecessor in interest to  
24 MACLLC with respect to the certain assets including dies which were sold by Medallic LTD to  
25 Medallic Art Company LP in 2009. After the acquisition of assets from Medallic LTD, Medallic was  
26

DECLARATION OF PAUL WAGNER - 1

501036488 v3

K&L GATES LLP  
925 FOURTH AVENUE  
SUITE 2900  
SEATTLE, WASHINGTON 98104-1158  
TELEPHONE: (206) 623-7580  
FACSIMILE: (206) 623-7022

1 run as a division of NWTM in that product sold under the “Medallic Art” brand was created and  
2 marketed by NWTM employees at NWTM facilities.

3 3. It has always been my understanding that NWTM retained ownership of all dies  
4 created by the Medallic Art division of NWTM. At the request of the Trustee, I pulled, from  
5 NWTM’s business records, a sample price quote for a die manufactured in 2012 by NWTM “dba  
6 Medallic Art Company.” A copy of the price quote is attached hereto as Exhibit A. It clearly states  
7 that all rights, title and interest in dies are exclusively the product of Medallic Art Company.  
8

9 4. NWTM retained a copyright interest in the designs it created for customers by  
10 NWTM’s artists, both under the NWTM and Medallic Art Company names. Attached hereto as  
11 Exhibit B is a sample of a design proof sent to a customer which informs it of the company’s  
12 copyright on the design and art.  
13

14 5. I located, in NWTM’s records, an invoice from 2009 from Medallic LTD, a copy of  
15 which is attached as Exhibit C. It clearly states, “NOTICE: All right, title, and interest in and to all  
16 dies, models, sculptures, designs, engravings, sketches, and all other artistic renderings and materials  
17 used for and in the creation of the products sold hereunder, and all intellectual rights embodies  
18 therein, including, without limitation, all copyrights, patents, trade secrets, manufacturing methods,  
19 and related proprietary information are and shall remain exclusively and perpetually the property of  
20 the Medallic Art Company, LTD.”  
21

22 //

23 //

24 //

25 //  
26

DECLARATION OF PAUL WAGNER - 2

501036488 v3

K&L GATES LLP  
925 FOURTH AVENUE  
SUITE 2900  
SEATTLE, WASHINGTON 98104-1158  
TELEPHONE: (206) 623-7580  
FACSIMILE: (206) 623-7022

1 I declare under penalty of perjury that the foregoing is true and correct to the best of my  
2 knowledge and belief.

3 EXECUTED this 16th day of February, at Seattle, Washington.  
4

5 By: /s/ Paul Wagner  
6 Paul Wagner  
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DECLARATION OF PAUL WAGNER - 3

501036488 v3

K&L GATES LLP  
925 FOURTH AVENUE  
SUITE 2900  
SEATTLE, WASHINGTON 98104-1158  
TELEPHONE: (206) 623-7580  
FACSIMILE: (206) 623-7022

1 **CERTIFICATE OF SERVICE**

2 The undersigned declares as follows:

3 That she is a Paralegal in the law firm of K&L Gates LLP, and on February 16, 2018, she  
4 caused the foregoing document to be filed electronically through the CM/ECF system which caused  
5 Registered Participants to be served by electronic means, as fully reflected on the Notice of  
6 Electronic Filing.

7 Also on February 16, 2018, she caused the foregoing document to be placed in the mail to the  
8 Parties at the addresses listed below:

9 Northwest Territorial Mint LLC  
10 c/o Ross Hansen, Member  
11 P.O. Box 2148  
12 Auburn, WA 98071-2148

13 I declare under penalty of perjury under the laws of the State of Washington and the United  
14 States that the foregoing is true and correct.

15 Executed on the 16th day of February, 2018 at Seattle, Washington.

16 /s/ Denise A. Lentz  
17 Denise A. Lentz  
18  
19  
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26

DECLARATION OF PAUL WAGNER - 4

501036488 v3

K&L GATES LLP  
925 FOURTH AVENUE  
SUITE 2900  
SEATTLE, WASHINGTON 98104-1158  
TELEPHONE: (206) 623-7580  
FACSIMILE: (206) 623-7022

# EXHIBIT A



# NORTHWEST TERRITORIAL MINT LLC

dba MEDALLIC ART COMPANY

80 E. Airpark Vista Blvd.

Dayton, NV 89403

Phone: 775-246-6000

Fax: 775-246-6006

Event 9/29  
In hands 9/21/12

## Quotation

Quote LUBBOCK CHRISTIAN UNIVERSITY

To: 5601 19th Street  
Lubbock, TX 79407  
United States

Quote Number:	46315	Contact:	Warren McNeill
Quote Date:	08/13/12	Expires:	09/18/12
Customer:	MA-6000256	Inquiry:	
Salesman:	SUSAN SKAGGS	Terms:	Payable On Receipt
Ship Via:	Federal Express	Phone:	(806) 720-7212
FOB:	Dayton, NV	FAX:	

PLEASE REVIEW QUOTE. SIGN FOR APPROVAL AND FAX OR EMAIL BACK ASAP SO AS NOT TO DELAY SHIPPING.  
THANK YOU FOR YOUR ORDER!

APPROVED BY

DATE

Item	Part Number Description	Revision	Quantity	Price
1	SS08131202 PROVOST'S CHAIN OF OFFICE - 3-1/2 INCH ANTIQUE BRONZE MEDAL TAP AND DRILLED AT 11 AND 1 O'CLOCK POSITIONS WITH SIMPLE BRONZE NECK CHAIN IN CARDBOARD GIFT BOX		1	\$915.00 /EA
2	NECK CHAIN SIMPLE BRONZE NECK CHAIN		1	\$100.00 /EA
3	DIE SERVICE CHARGE FOR PREPARATION OF OBERSE DIE		1	\$750.00 /EA
4	ASSEMBLY SERVICE CHARGE FOR ASSEMBLY		1	\$50.00 /EA
5	MAC011039 BOX, BURGUNDY BOX WITH VELVET FOAM INSERT, 4.25" X 4.25"		1	\$0.00 /EA
6	SHIPPING		1	\$25.00 /EA

Part Number

Item   Description

Revision

Quantity

Price

SHIPPING AND HANDLING CHARGE

**Total:      \$1,840.00**

Notice: All rights, title and interest in and to all dies, models, sculptures, designs, engravings, sketches, and all other artistic renderings and materials used in the creation of the products sold hereunder including without limitation all patents, trade secrets manufacturing methods and related proprietary information are and shall remain exclusively and perpetually the property of Medallic Art Company. No such product (or any part thereof) may be duplicated or otherwise reproduced by any process, technique, devise or means whatsoever without the prior written permission of the Medallic Art Company.

---

By Susan Skaggs

NORTHWEST TERRITORIAL MINT LLC



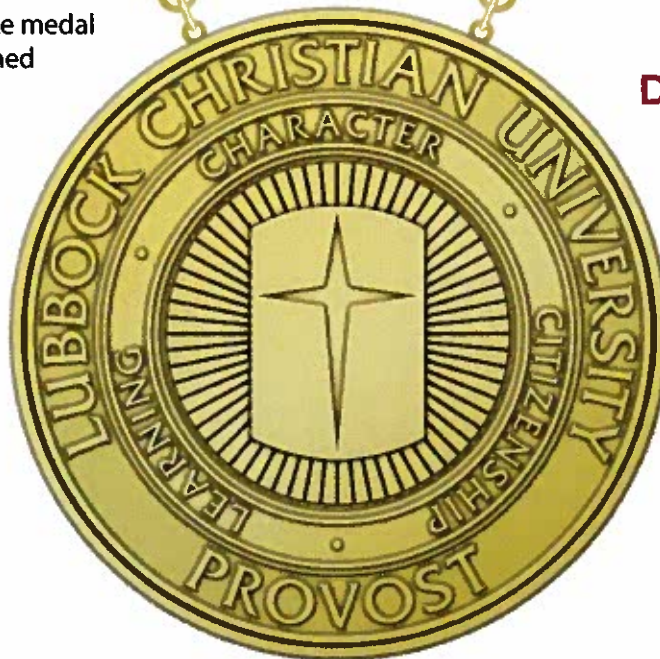
# Medallic Art

Provost Chain of Office  
Design #1

**RUSH**  
In-hands date  
for event:  
**Sept. 21, 2012**

3.5" diameter antiqued bronze medal  
with simple chain attached  
(shown actual size)

**DIE #: 2012-260**



DATE: 8-17-12

CLIENT: Lubbock Christian University

APPROVED BY: \_\_\_\_\_

SALES CONTACT: Susan Skaggs

GRAPHICS: Angel Dey

JOB NUMBER: A040408

DATE: \_\_\_\_\_

© 2012 Medallic Art

This artwork is not to be copied by anyone by any means without first receiving permission from Medallic Art.



# Medallic Art

Provost Chain of Office  
Design #1

Event - In Hands Date  
9/21/12

Die # 2012-260

3.5" diameter antiqued bronze medal  
with simple chain attached  
(shown actual size)



DATE: 8-17-12

CLIENT: Lubbock Christian University

SALES CONTACT: Susan Skaggs

GRAPHICS: Angel Dey

JOB NUMBER: A040408

APPROVED BY:

DATE:

8/20/12

© 2012 Medallic Art

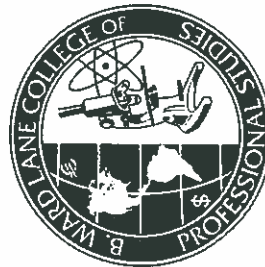
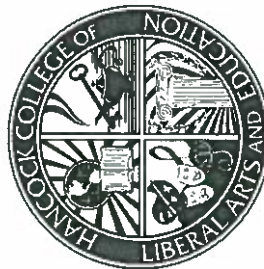
This artwork is not to be copied by anyone by any means without first receiving permission from Medallic Art.

Angel doing  
Art

Jerry,

Will your round up the seals for our three colleges and get those to Susan? See if they can also produce medallions for us, along with one more plain one for the provost. On the provost medallion, let's put provost where president was on the other one, and let's make four of these brass with no blue fill.

Thanks,  
Warren



3" @ \$429

3 1/2" — \$915<sup>00</sup>

Simple chain

\* Event 9/23 \*

# EXHIBIT B



# Medallic Art

3" diameter Big Ten medals  
Shown actual size

**Die #: 1916-008**  
for years 1984-1991



Shows teams:  
Illinois, Indiana, Iowa, Michigan, Michigan State,  
Minnesota, Northwestern, Ohio State, Purdue, Wisconsin

**Die #: 2014-120**  
for years 1992-2011



Shows teams:  
Illinois, Indiana, Iowa, Michigan, Michigan State, Minnesota,  
Northwestern, Ohio State, Penn State, Purdue, Wisconsin

**Die #: 2012-308**



Shows teams:  
Illinois, Indiana, Iowa, Michigan, Michigan State, Minnesota,  
Nebraska, Northwestern, Ohio State, Penn State, Purdue, Wisconsin

**Die #: 2013-260**



Shows teams:  
Illinois, Indiana, Iowa, Maryland, Michigan, Michigan State, Minnesota,  
Nebraska, Northwestern, Ohio State, Penn State, Purdue, Rutgers, Wisconsin

DATE: 5-14-14

CLIENT: Big Ten Conference

SALES CONTACT: Susan Skaggs

GRAPHICS: Angel Dey

JOB NUMBER: A041627

APPROVED BY: \_\_\_\_\_

DATE: \_\_\_\_\_

# EXHIBIT C



**SALES ORDER**  
ACKNOWLEDGEMENT

**MEDALLIC ART COMPANY LTD.**

80 Airpark Vista Boulevard • Dayton, NV 89403  
775-246-6000 • Fax: 775-246-6006 • Toll Free: 1-800-843-9854  
E-Mail Address: minted@medallic.com • Internet Address: medallic.com

*#Invoiced 6/30/09*

Order Number: 0132057  
Order Date: 05/19/09  
Customer No: 02-3001486

SALESPERSON: KIM CLARK

SOLD TO:

SIGMA PI PHI FRATERNITY  
KATRINA NELSON  
50 HURT PLAZA STE 750  
ATLANTA GA 30303

SHIP TO:

SIGMA PI PHI FRATERNITY  
ATTN: KATRINA NELSON  
50 HURT PLAZA STE 750  
ATLANTA GA 30303

Customer Phone #: (404) 529-9919 Customer Fax #: 404-529-9976

CUSTOMER P.O.	SHIP VIA	F.O.B.	SHIP DATE	TERMS		
KATRINA NELSON	FEDEX GROUND	DAYTON	07/27/09	ADVANCE PAYMENT REQUIRED		
DESCRIPTION		QTY. ORDERED	QTY. SHIPPED	BACK ORDERED	PRICE	AMOUNT
HENRY M MINTON FELLOW MEDAL						
3" LIGHT OXIDIZED BRONZE MEDAL IN CARDBOARD GIFT BOX		20	20		110.00	2,200.00
ADD FOR TAP AND DRILL WITH WITH LIGHT BLUE/WHITE NECK- RIBBON PER MEDAL		20	20		15.00	300.00
BLUE VELVET PENDANT CASE		20	20		13.75	275.00
SERVICE CHARGE FOR PREPARATION OF OBVERSE SCULPTED MODEL		1			1,400.00	1,400.00
SERVICE CHARGE FOR PREPARATION OF 3" OBVERSE DIE CUT FROM SCULPTED MODEL		1			750.00	750.00
SERVICE CHARGE FOR PREPARATION OF 3" THREE-DIMENSIONAL REVERSE DIE		1			1,000.00	1,000.00
SHIPPING/HANDLING CHARGE		1			60.00	60.00
PLEASE REMIT \$5,985.00 IN ADVANCE PAYMENT ASAP SO AS NOT TO DELAY THE ABOVE LISTED SHIP DATE.						
Obverse die 2009-105 (NEW)						
APPROVED BY			DATE			
Reverse die 2009-106 (NEW)						
THANK YOU FOR YOUR ORDER!						

NOTICE: ALL RIGHT, TITLE, AND INTEREST IN AND TO ALL DIES, MODELS, SCULPTURES, DESIGNS, ENGRAVINGS, SKETCHES, AND ALL OTHER ARTISTIC RENDERINGS AND MATERIALS USED FOR AND IN THE CREATION OF THE PRODUCTS SOLD HEREUNDER, AND ALL INTELLECTUAL RIGHTS EMBODIED THEREIN, INCLUDING, WITHOUT LIMITATION, ALL COPYRIGHTS, PATENTS, TRADE SECRETS, MANUFACTURING METHODS, AND RELATED PROPRIETARY INFORMATION ARE AND SHALL REMAIN EXCLUSIVELY AND PERPETUALLY THE PROPERTY OF THE MEDALLIC ART COMPANY, LTD. NO SUCH PRODUCT (OR ANY PART THEREOF) MAY BE DUPLICATED OR OTHERWISE REPRODUCED BY ANY PROCESS, TECHNIQUE, DEVICE OR MEANS WHATSOEVER WITHOUT THE PRIOR WRITTEN PERMISSION OF THE MEDALLIC ART COMPANY.

ORDER: 5,985.00  
FREIGHT:  
SALES TAX: .00  
ADVANCE PAYMENT RECEIVED:

**INVOICE TOTAL:**

Check Number: \_\_\_\_\_ Date Received: \_\_\_\_\_

**P.02**



## SALES ORDER

Actual Cost: 25.00

**MEDALLIC ART COMPANY LTD.**

80 Airpark Vista Boulevard • Dayton, NV 85401  
775-246-6001 • Fax: 775-246-6006 • Toll Free: 1-800-843-9854  
E-Mail Address: [info@medallion.com](mailto:info@medallion.com) • Internet Address: [medallion.com](http://medallion.com)

Order Number: 0132057  
Order Date: 05/19/09  
Customer No: 02-3001486

**SALESPERSON: KIM CLARK**

**SOLD TO:**

SIGMA PI PHI FRATERNITY  
KATRINA NELSON  
50 HURT PLAZA STE 750  
ATLANTA GA 30303

SHIP TO:

SIGMA PI PHI FRATERNITY  
ATTN: KATRINA NELSON  
50 HURT PLAZA STE 750  
ATLANTA GA 30303

Customer Phone #: (404) 529-9919      Customer Fax #: 404-529-9976

CUSTOMER P.O.	SHIP VIA	F.O.B.	SHIP DATE	TERMS	
KATRINA NELSON	FEDEX GROUND	DAYTON	07/27/09	ADVANCE PAYMENT REQUIRED	
DESCRIPTION	QTY. ORDERED	QTY. SHIPPED	BACK ORDERED	PRICE	AMOUNT
HENRY M MINTON FELLOW MEDAL					
3" LIGHT OXIDIZED BRONZE MEDAL IN CARDBOARD GIFT BOX	20			110.00	2,200.00
ADD FOR TAP AND DRILL WITH WITH LIGHT BLUE/WHITE NECK- RIBBON PER MEDAL	20			15.00	300.00
BLUE VELVET PENDANT CASE	20			13.75	275.00
SERVICE CHARGE FOR PREPARATION OF OBTVERSE SCULPTED MODEL	1			1,400.00	1,400.00
SERVICE CHARGE FOR PREPARATION OF 3" OBTVERSE DIE CUT FROM SCULPTED MODEL	1			750.00	750.00
SERVICE CHARGE FOR PREPARATION OF 3" THREE-DIMENSIONAL REVERSE DIE	1			1,000.00	1,000.00
SHIPPING/HANDLING CHARGE	1			60.00	60.00
PLEASE REMIT \$5,985.00 IN ADVANCE PAYMENT ASAP SO AS NOT TO DELAY THE ABOVE LISTED SHIP DATE.					
2009-105 (NEW) APPROVED BY <u>[Signature]</u> 2009-106 (NEW)		DATE <u>5/30/09</u>			
THANK YOU FOR YOUR ORDER!					
NOTICE: ALL RIGHTS, TITLE AND INTEREST IN AND TO ALL OUR DESIGNS, SCULPTURES, LOGOS, INVENTIONS, PATENTS AND ALL OTHER RIGHTS IN YOURSING AND MATERIALS IN YOUR AND IN THE CREATION OF THE PRODUCTS CONTAINED HEREIN, AND ALL OTHER TITLES, PATENTS, TRADE MARKS, INCLUDING, WITHOUT LIMITATION, ALL COPYRIGHTS, PATENTS, TRADE SECRETS, NAME, INCLUDING ALIASES, AND RELATED PROPERTIES, AND OTHER RIGHTS ARE AND SHALL REMAIN SOLELY AND EXCLUSIVELY THE PROPERTY OF THE COMPANY. THE COMPANY HAS NO SUCH PROBLEM. ANY PART THEREOF MAY BE USED FOR ANY PURPOSES WITHOUT ANY RESTRICTIONS. THE COMPANY HAS NO SUCH PROBLEM. ANY PART THEREOF MAY BE USED FOR ANY PURPOSES WITHOUT ANY RESTRICTIONS.				ORDER 5,985.00 ADVANCE PAYMENT RECEIVED INVOICE TOTAL:	.00

English: English

1248 K.4 15-16

1977-1978

Telephone: 404.529.9919  
Fax: 404.529.9976  
E-Mail: [info@sigma-pi-phi.org](mailto:info@sigma-pi-phi.org)  
Website: <http://www.sigma-pi-phi.net>

**Sigma Pi Phi Fraternity**  
**50 Hurt Plaza, Ste. 750**  
**Atlanta, GA 30303**

# Fax

**To:** Kim Clark

**From:** Katrina Nelson

**Fax:** 775-246-8006

**Pages:** 3 (including this one)

**Phone:**

**Date:**

☐ Urgent    ☒ For Review    ☐ Please Comment    ☐ Please Reply    ☐ Please Recycle

**Sigma Pi Phi**  
**Henry M. Minton Fellow medal**  
**on Light Blue/White neck ribbon**  
**Design #1**  
 (shown actual size)



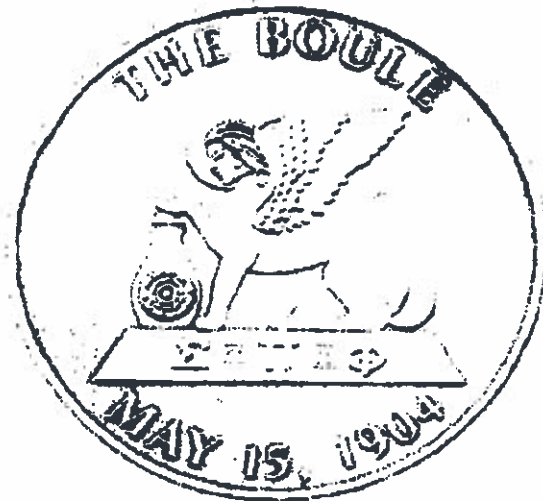
Obverse  
medal  
illustration

NOTE: Center  
image will  
be sculpted  
and will look  
3-D

(Grayscale  
at left  
shows detail)



Reverse



APPROVED BY: *[Signature]*

DATE: 5/20/09

NOTE: SIZE INACCURACIES MAY RESULT FROM VARIATIONS IN DEVICE SETTINGS.



**MEDALLION ART COMPANY LTD**

80 AIRPARK VISTA BOULEVARD, DAYTON, NV 89403

TOLL FREE: 800-843-9854

FAX: 775-246-6006

©2009 Medallion Art Co.

CLIENT: Sigma Pi Phi

SALESPERSON: Kim Clark

REVISION #: \_\_\_\_\_

DATE: 5-20-09

Sigma Pi Phi  
Henry M. Minton Fellow medal  
on Light Blue/White neck ribbon

Design #1  
(shown actual size)



Obverse  
medal  
illustration

NOTE: Center  
image will  
be sculpted  
and will look  
3-D

(Grayscale  
at at left  
shows detail)



Reverse



APPROVED BY: \_\_\_\_\_ DATE: \_\_\_\_\_

NOTE: SIZE INACCURACIES MAY RESULT FROM VARIATIONS IN DEVICE SETTINGS.



**MEDALLIC ART COMPANY LTD**

80 AIRPARK VISTA BOULEVARD, DAYTON, NV 89403

TOLL FREE: 800-843-9854

FAX: 775-246-6006

©2009 Medallion Art Co.

CLIENT: Sigma Pi Phi

SALESPERSON: Kim Clark

REVISION #: \_\_\_\_\_

DATE: 5-20-09

[Print](#) | [Close Window](#)

**Subject: Medallic Art-Sigma Pi Phi artwork**

**From: minted@medallic.com**

**Date: Thu, May 21, 2009 11:40 am**

**To: katrinaspp@bellsouth.net**

Dear Katrina:

Here is the artwork of the Sigma Pi Phi Henry M. Minton Fellow medal, per your request.

Medallic Art Company  
80 Airpark Vista Blvd.  
Dayton, NV 89403  
Toll free: 800-843-9854  
Fax: 775-246-6006  
Email: minted@medallic.com  
Web site: www.medallic.com

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